

1 KEVIN V. RYAN (CSBN 118321)  
2 United States Attorney

FILED  
05 JUN 23 PM 3:09  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

3  
4  
5  
6 SEALED  
7 BY COURT ORDER  
8

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 YOUNG JOON YANG, aka Yang,  
16 WU SANG NAH, aka Kang  
17 SUNG YONG KIM, aka Nam, aka Mr. Kim,  
18 HANG JOE YOON, aka Mr. Lee,  
19 MYONG SU AHN, aka Paula Lee,  
20 NAM YOUNG LEE,  
21 FRED A. FRAZIER,  
22 TRONG DU NGUYEN, aka John  
23 AHDI M. NASHASHIBI,  
24 YOUNG JOO LEE,  
25 MIN YOUNG BANG,  
26 IN SEUNG KIM,  
27 SEYUN KIM,  
28 EUGENE YI,  
CHANG SOO YOUN,  
MO SOOK YANG,  
KEUN SUNG LEE, aka Kenneth,  
MYUNG JIN CHANG,  
WON SEOK YOO,  
JIMMY GONG YAN LEE,  
AESUN KIM, aka Mami,  
HYEON J. PARK,  
ANTHONY GAR LAU,  
MI YOUNG SIM, aka Jackie,  
KUM PAE YI,  
HAN LEE,  
HYE CHA KIM, aka Kelly,  
JIN AH KANG,  
YON SUK PANG, aka Nana,

Defendants.

CR 05 00395 JSW

VIOLATIONS: 8 U.S.C. § 1324  
(a)(1)(A)(v)(I) - Harboring Conspiracy;  
18 U.S.C. §§ 1591(a)(1) and (2) - Sex  
Trafficking; 18 U.S.C. § 1956(h) - Money  
Laundering Conspiracy;  
18 U.S.C. § 371 - Conspiracy;  
18 U.S.C. § 2421 - Mann Act;  
18 U.S.C. § 1952 - Use of Facility in Aid of  
Unlawful Activity; 18 U.S.C. § 2 - Aiding  
and Abetting

SAN FRANCISCO VENUE

(UNDER SEAL)

1 INDICTMENT

2 The Grand Jury charges:

3 COUNT ONE: (8 U.S.C. § 1324(a)(1)(A)(v)(I) – Conspiracy to Bring in and Harbor Aliens)

4 OBJECT OF THE CONSPIRACY

5 1. Between in or about September 2001, and continuing to on or about October 13,  
6 2004, in San Francisco, California, within the Northern District of California, and elsewhere,  
7 defendants

8 **YOUNG JOON YANG,**  
9 aka Yang,  
10 **WU SANG NAH**  
11 aka Kang,  
12 **SUNG YONG KIM**  
13 aka Nam, aka Mr. Kim,  
14 **FRED A. FRAZIER,**  
15 **TRONG DU NGUYEN,**  
16 aka John, and  
17 **AHDI NASHASHIBI,**

18 and others known and unknown to the Grand Jury, conspired to knowingly transport, move,  
19 conceal, harbor, and shield from detection illegal aliens, in various places, including Kings  
20 Massage, located at 315 Jessie Street, San Francisco, California (hereinafter “Kings Massage”),  
21 from immigration and law enforcement authorities, for the purpose of commercial advantage and  
22 their personal financial gain.

23 MANNER AND MEANS OF THE CONSPIRACY

24 The object of the conspiracy was accomplished as follows:

25 2. Co-conspirators, including **WU SANG NAH**, and others known and unknown to the  
26 Grand Jury, in South Korea and Canada recruited and enticed female Korean nationals to  
27 illegally enter the United States from South Korea and Canada to work as prostitutes in the  
28 United States.

3. Co-conspirators in South Korea and Canada, including **WU SANG NAH**, and others  
known and unknown to the Grand Jury, made arrangements with co-conspirators in the United  
States, including **SUNG YONG KIM**, and others known and unknown to the Grand Jury, to  
smuggle the female Korean nationals into the United States via Canada for the purpose of having

1 them work as prostitutes in and around San Francisco, including, but not limited to Kings  
2 Massage, and for private financial gain.

3 4. Co-conspirators, including **WU SANG NAH, SUNG YONG KIM**, and others  
4 known and unknown to the Grand Jury, unlawfully smuggled the female Korean nationals across  
5 the United States-Canadian border, to facilitate their prostitution, and for private financial gain.

6 5. Co-conspirators, including **WU SANG NAH, SUNG YONG KIM, YOUNG JOON**  
7 **YANG**, and others known and unknown to the Grand Jury, transported, and arranged for others  
8 to transport, the female Korean nationals, with knowledge that the female Korean aliens were  
9 unlawfully in the United States, to brothels in San Francisco, California, including Kings  
10 Massage, where co-conspirators put the female Korean nationals to work as prostitutes, and for  
11 commercial advantage and personal financial gain.

12 6. At Kings Massage, the female Korean nationals were directed to sit before  
13 prostitution customers and others, while co-conspirators encouraged the customers to select one  
14 of the female Korean nationals for sex acts, and then collected money from the customers, who  
15 would pay to engage in sex acts with the female Korean nationals in one of the private rooms at  
16 Kings Massage.

17 7. Co-conspirators, including **FRED S. FRAZIER, TRONG DU NGUYEN, AHDI**  
18 **NASHASHIBI**, and others known and unknown to the grand jury, harbored some of the female  
19 Korean nationals at Kings Massage and supported and maintained these female Korean nationals  
20 by providing them with room and board, to facilitate their prostitution, and for commercial  
21 advantage and private financial gain.

22 8. Other co-conspirators, including **YOUNG JOON YANG**, and others known and  
23 unknown to the Grand Jury, transported these female Korean nationals to massage parlors, and  
24 other locations in the San Francisco, California area, to facilitate their prostitution, and for  
25 commercial advantage and private financial gain.

26 OVERT ACTS

27 9. In furtherance of the conspiracy and to accomplish the object of the conspiracy,  
28 defendants **YOUNG JOON YANG, WU SANG NAH, SUNG YONG KIM, FRED A.**

1 **FRAZIER, TRONG DU NGUYEN, AHDI M. NASHASHIBI**, and others known and  
2 unknown to the Grand Jury, committed various overt acts within the Northern District of  
3 California and elsewhere, including, but not limited to, the following:

4 10. In or about May 2004, defendant **WU SANG NAH, SUNG YONG KIM**, and other  
5 co-conspirators known and unknown to the Grand Jury, made arrangements for two female  
6 Korean nationals to be smuggled across the Canadian-United States border illegally, and for their  
7 personal financial gain.

8 11. In or about May 2004, after being smuggled across the border by defendant **WU**  
9 **SANG NAH**, and others known and unknown to the Grand Jury, the two female Korean  
10 nationals made their way to Virginia, and contacted defendant **WU SANG NAH** who committed  
11 to providing them with transportation from Virginia.

12 12. In or about May 2004, defendant **WU SANG NAH** contacted defendant **SUNG**  
13 **YONG KIM** and arranged transportation for the two female Korean nationals from Virginia to  
14 San Francisco, via Los Angeles, California.

15 13 In or about May 2004, defendant **SUNG YONG KIM** arranged for the two female  
16 Korean nationals to be delivered to Los Angeles, California.

17 14. In or about May 2004, defendant **SUNG YONG KIM** drove the two female Korean  
18 nationals from Los Angeles to Kings Massage, where co-conspirators at Kings Massage paid  
19 defendant **SUNG YONG KIM** a trafficking fee for the two female Korean nationals.

20 15. Between in or about May 2004 and on or about August 12, 2004, co-conspirators at  
21 Kings Massage directed the two female Korean nationals to work as prostitutes until their  
22 trafficking debts were paid in full. During that time period, co-conspirators collected and  
23 maintained control over the prostitution proceeds until their debts were paid in full.

24 16. Between in or about May 2004 and on or about August 12, 2004, co-conspirators  
25 received prostitution customers at Kings Massage, allowed the customers to select one of the two  
26 female Korean nationals who were being harbored at Kings Massage for sexual activity, and  
27 collected money from the customers, who would pay to engage in sexual activities with the two  
28 female Korean nationals.

1           17. Between in or about May 2004 and on or about August 12, 2004, defendant **FRED**  
2 **A. FRAZIER** was the registered owner of Kings Massage, wrote checks on behalf of the  
3 business operations, and received monthly payments from the co-owners of Kings Massage, for  
4 his own private financial gain, knowing that Kings Massage operated as a brothel and that female  
5 Korean nationals working at Kings Massage were in the United States unlawfully.

6           18. Between in or about May 2004 and on or about August 12, 2004, defendant **AHDI**  
7 **M. NASHASHIBI** owned the building located at 315 Jessie Street, San Francisco, that housed  
8 Kings Massage, and received rent from the co-owners of Kings Massage, for his own private  
9 financial gain, knowing that Kings Massage was operating as a brothel, and with knowledge that  
10 the female Korean nationals working at Kings Massage were in the United States unlawfully.

11           19. Between in or about May 2004 and on or about August 12, 2004, defendant  
12 **TRONG DU NGUYEN** kept the books, wrote checks on behalf of Kings Massage, and received  
13 payments from the co-owners of Kings Massage for his own personal financial gain, knowing  
14 that Kings Massage was operating as a brothel, and that the female Korean nationals working  
15 there were in the United States unlawfully.

16           20. Between in or about May 2004 and on or about August 12, 2004, **YOUNG JOON**  
17 **YANG** transported the female Korean nationals working at Kings Massage in and around San  
18 Francisco, and received compensation for his own private financial gain, knowing that the female  
19 Korean nationals working at Kings Massage were in the United States unlawfully.

20           All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

21  
22 COUNT TWO: (18 U.S.C. §§ 1591(a)(1) and (2) – Sex Trafficking; 18 U.S.C. § 2 – Aiding and  
23 Abetting)

24           21. Between in or about May 2004 and on or about August 12, 2004, within the  
25 Northern District of California and elsewhere, the defendants

26                           **YOUNG JOON YANG**  
27                                   aka Yang, and  
28                           **SUNG YONG KIM**,  
  aka Nam, aka Mr. Kim

together with others known and unknown to the Grand Jury, did knowingly recruit, entice,

1 harbor, transport, provide and obtain by any means a person, Jane Doe 1, in and affecting  
2 interstate and foreign commerce, and did benefit financially and by receiving a thing of value  
3 from participation in a venture engaged in such acts, knowing that force, fraud, or coercion  
4 would be used to cause such person to engage in a commercial sex act, in violation of Title 18  
5 United States Code Sections 1591(a)(1) and (2), and Title 18 United States Code Section 2.

6  
7 COUNT THREE: (18 U.S.C. §§ 1591(a)(1) and (2) – Sex Trafficking; 18 U.S.C. § 2 – Aiding  
8 and Abetting)

9 22. Between in or about May 2004 and on or about August 12, 2004, within the  
10 Northern District of California and elsewhere, the defendants

11 **YOUNG JOON YANG**  
12 aka Yang and  
13 **SUNG YONG KIM,**  
14 aka Nam, aka Mr. Kim

15 together with others known and unknown to the Grand Jury, did knowingly recruit, entice,  
16 harbor, transport, provide and obtain by any means a person, Jane Doe 2, in and affecting  
17 interstate and foreign commerce, and did benefit financially and by receiving a thing of value  
18 from participation in a venture engaged in such acts, knowing that force, fraud or coercion would  
19 be used to cause such person to engage in a commercial sex act, in violation of Title 18 United  
20 States Code Sections 1591(a)(1) and (2), and Title 18 United States Code Section 2.

21 COUNT FOUR: (18 U.S.C. § 1956(h) – Money Laundering Conspiracy)

22 OBJECT OF THE CONSPIRACY

23 23. Between in or about September 2001 and on or about October 13, 2004, in the  
24 Northern District of California, and elsewhere, the defendants,

25 **YOUNG JOON YANG,**  
26 aka Yang,  
27 **HANG JOE YOON,**  
28 aka Mr. Lee,  
**MYONG SU AHN,**  
aka Paula Lee, and  
**NAM YOUNG LEE,**

and others known and unknown to the Grand Jury, conspired with each other to transport,

1 transmit and transfer, and to attempt to transport, transmit and transfer, a monetary instrument  
2 and funds from a place in the United States, knowing that the monetary instruments and funds  
3 involved in the transportation, transmission and transfer represented the proceeds of some form  
4 of unlawful activity, to and through a place outside the United States, namely, Korea, knowing  
5 that such transportation, transmission and transfer was designed in whole or in part to conceal  
6 and disguise the nature, location, source, ownership, and control of the proceeds of specified  
7 unlawful activities, to wit: alien harboring in violation of 8 U.S.C. § 1324, and interstate  
8 transportation for prostitution in violation of 18 U.S.C. § 2421, both for the purpose of financial  
9 gain, as set forth in 18 U.S.C. § 1961(1)(F).

10 MANNER AND MEANS OF THE CONSPIRACY

11 The manner and means by which the conspiracy was carried out included the following:

12 24. Between in or about September 2001 and on or about October 13, 2004, the  
13 defendants and others, known and unknown to the Grand Jury, engaged in specified unlawful  
14 activity, to wit: alien harboring in violation of 8 U.S.C. § 1324, and interstate transportation for  
15 prostitution in violation of 18 U.S.C. § 2421, both for the purpose of financial gain, as set forth in  
16 18 U.S.C. § 1961(1)(F);

17 25. In order to conceal and disguise the proceeds of their own and others' unlawful  
18 activities, the defendants used and employed various individuals to transport, transmit, and  
19 transfer these proceeds from the United States to Korea.

20 All in violation of Title 18 United States Code Section 1956(h).

21  
22 COUNT FIVE: (18 U.S.C. § 371 – Mann Act Conspiracy)

23 OBJECT OF THE CONSPIRACY

24 26. Beginning at a date unknown, but no later than on or about February 22, 2005, and  
25 continuing to on or about June 23, 2005, in San Francisco County, within the Northern District of  
26 California, and elsewhere, defendants

27 **YOUNG JOON YANG,**  
28 aka Yang,

1                   **YOUNG JOO LEE,**  
2                   **MIN YOUNG BANG,**  
3                   **IN SEUNG KIM,**  
4                   **SEYUN KIM,**  
                  **EUGENE YI, and**  
                  **CHANG SOO YOUN,**

5 and others known and unknown to the Grand Jury, conspired to knowingly transport female  
6 Korean nationals in interstate and foreign commerce, by purchasing plane tickets to and from  
7 destinations within and outside the state of California, and by transporting female Korean  
8 nationals to and from brothels in San Francisco, California, with the intent that the female  
9 Korean nationals would engage in prostitution and in sexual activities for which a person could  
10 be charged with a criminal offense, in violation of Title 18 United States Code Section 2421.

11                   **MANNER AND MEANS OF THE CONSPIRACY**

12               27. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
13 **JOON YANG** owned and operated an underground taxi service known as Yang's Taxi, located  
14 in San Francisco, California.

15               28. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
16 **JOON YANG** owned and operated YJY Travel and Tour located at 3001 Geary Street, #204,  
17 San Francisco, California.

18               29. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
19 **JOON YANG** employed various drivers and assistants, including **YOUNG JOO LEE, MIN**  
20 **YOUNG BANG, IN SEUNG KIM, SEYUN KIM, EUGENE YI, CHANG SOO YOUN,** and  
21 others known and unknown to the Grand Jury, to serve Yang's Taxi and YJY Travel and Tour  
22 businesses.

23               30. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
24 **JOON YANG** and his employees used YJY Travel and Tour to purchase airline tickets for  
25 interstate domestic travel for prostitutes working at various brothels in San Francisco, California.

26               31. Between no later than on or about February 22, 2005 and June 23, 2005, Yang's  
27 Taxi was in the business of transporting prostitutes to and from airports, for the purpose of  
28 interstate travel, and to and from brothels in San Francisco, California, where those prostitutes



1 would engage in acts of prostitution.

2 32. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
3 **JOON YANG** and his employees utilized two cellular telephones to conduct business for Yang's  
4 Taxi and YJY Travel and Tour at their "base" of operations located at 3001 Geary Street, #204,  
5 San Francisco, California.

6 33. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
7 **JOON YANG** and his employees took turns staffing the base of operations and one of the two  
8 cellular telephones to conduct business for Yang's Taxi and YJY Travel and Tour.

9 34. Between no later than on or about February 22, 2005 and June 23, 2005, **YOUNG**  
10 **JOON YANG** and his employees, based on phone calls received from prostitutes, assigned  
11 drivers employed by Yang's Taxi to pick up and drop off prostitutes at brothels, airports, and  
12 other locations in and around San Francisco, California.

13 OVERT ACTS

14 35. In furtherance of the conspiracy and to accomplish the object of the conspiracy,  
15 defendants **YOUNG JOON YANG**, aka Yang, **YOUNG JOO LEE**, **MIN YOUNG BANG**, **IN**  
16 **SEUNG KIM**, **SEYUN KIM**, **EUGENE YI**, and **CHANG SOO YOUN**, and others known  
17 and unknown to the Grand Jury, committed various overt acts within the Northern District of  
18 California and elsewhere, including, but not limited to, the following:

19 36. On or about March 3, 2005, **YOUNG JOO LEE** spoke with a Korean-speaking  
20 female (KSF 1) and discussed transportation to Lee's Oriental Massage, a brothel in San  
21 Francisco, California.

22 37. On or about March 8, 2005, **YOUNG JOON YANG** spoke with KSF 1 and  
23 discussed transportation from San Francisco International Airport.

24 38. On or about March 8, 2005, **YOUNG JOO LEE** spoke with KSF 1 who advised that  
25 she was returning to California from a trip to Las Vegas, Nevada.

26 39. On or about March 8, 2005, **YOUNG JOO LEE** drove to San Francisco  
27 International Airport in a white Lexus, retrieved KSF 1 and dropped her off at 1730 O'Farrell  
28 Street, San Francisco.

1           40. On or about March 12, 2005, **YOUNG JOON YANG** spoke with KSF 1, who  
2 requested transportation to San Francisco International Airport.

3           41. On or about March 12, 2005, KSF 1 was picked up at 1730 O'Farrell Street in a car  
4 rented by **YOUNG JOON YANG** and **IN SEUNG KIM** and driven to San Francisco  
5 International Airport for a flight to New York.

6           42. On or about March 15, 2005, **YOUNG JOO LEE** spoke with KSF 1 who requested  
7 transportation from San Francisco International Airport.

8           43. On or about March 23, 2005, **YOUNG JOO LEE** spoke with KFS 1 who requested  
9 a pickup at Lee's Oriental Massage, a brothel in San Francisco, California.

10          44. On or about March 13, 2005, **YOUNG JOON YANG** spoke with a Korean-  
11 speaking female (KSF 2) who requested that he purchase a plane ticket for her to travel from  
12 Oakland, California, to Las Vegas, Nevada, on March 15, 2005.

13          45. On or about March 13, 2005, **YOUNG JOON YANG** purchased a plane ticket for  
14 KSF 2 to travel from Oakland, California, to Las Vegas, Nevada.

15          46. On or about March 15, 2005, **YOUNG JOO LEE** spoke with KSF 2 who advised  
16 that she was traveling to Las Vegas, Nevada, and requested transportation to the airport.

17          47. On or about March 15, 2005, **YOUNG JOON YANG** picked up KSF 2 at 1550  
18 Eddy Street in San Francisco and drove her to Oakland International Airport.

19          48. On or about March 30, 2005, **YOUNG JOON YANG** called KSF 2 and asked that  
20 she to come work at Geneva Oriental Spa, a brothel in San Francisco.

21          49. On or about April 9, 2005, **YOUNG JOON YANG** spoke with KSF 2 and  
22 discussed her employment as a prostitute in San Francisco.

23          50. On or about March 17, 2005, **YOUNG JOON YANG** spoke with an associate and  
24 discussed KSF 3 who was flying from Dallas to San Francisco, and needed transportation from  
25 San Francisco International Airport.

26          51. On or about March 17, 2005, KSF 3 was picked up at San Francisco International  
27 Airport in a vehicle rented under the names **YOUNG JOON YANG** and **IN SEUNG KIM**, and  
28 driven to Suk Hee Oriental Massage and Sauna, a brothel in San Francisco.

1           52. On or about April 12, 2005, **YOUNG JOON YANG** spoke to a Korean-speaking  
2 female KSF 4 and discussed the purchase of a plane ticket to Las Vegas, Nevada.

3           53. On or about April 12, 2005, **YOUNG JOON YANG** purchased a plane ticket for  
4 KSF 4 to travel from Oakland, California, to Las Vegas, Nevada.

5           54. On or about April 12, 2005, **YOUNG JOON YANG** called KSF 4 and told her to  
6 "come down."

7           55. On or about April 12, 2005, KSF 4 was driven to the airport in a vehicle owned by  
8 and registered to **YOUNG JOON YANG**.

9           56. On or about April 15, 2005, **YOUNG JOO LEE** and KSF 4 discussed the purchase  
10 of a plane ticket from Las Vegas, Nevada, to Oakland, California.

11           57. On or about April 15, 2005, **YOUNG JOON YANG** purchased a plane ticket for  
12 KSF 4 to travel from Las Vegas, Nevada, to Oakland, California.

13           58. On or about April 18, 2005, **YOUNG JOO LEE** spoke with a KSF 4 and she  
14 requested transportation from Lucky Spa, a brothel in San Francisco.

15           59. On or about May 20, 2005, **YOUNG JOON YANG** spoke with a Korean-speaking  
16 female and discussed the purchase of plane tickets for KSF 5 and KSF 6 to travel from San  
17 Francisco to Boston. During that conversation, **YOUNG JOON YANG** asked KSF 4 whether  
18 she still worked at "Eighth Street."

19           60. On or about May 20, 2005, **YOUNG JOON YANG** purchased plane tickets for  
20 KSF 4 and KSF 5 to travel from San Francisco to Boston, Massachusetts.

21           61. On or about May 21, 2005, **YOUNG JOON YANG** called KSF 5 and told her to  
22 come outside because his driver was ready for her pickup.

23           62. On or about May 29, 2005, **YOUNG JOO LEE** spoke with KSF 5 who advised that  
24 she was coming in on Jet Blue from New York to Oakland.

25           63. On or about May 30, 2005, **YOUNG JOON YANG** spoke with KSF 5 regarding an  
26 airport pickup.

27           64. On or about May 30, 2005, **YOUNG JOO LEE** picked up KSF 5 and KSF 6 from  
28 Oakland International Airport and drove them to 1755 O'Farrell Street.

1           65. On or about May 30, 2005, **YOUNG JOON YANG** called a KSF 5 and asked her to  
2 come work for him at his "store."

3           66. On or about May 30, 2005, **YOUNG JOON YANG** spoke with KSF 5 who advised  
4 that she planned to work at Suk Hee Oriental Massage and Sauna, a brothel in San Francisco.

5           67. On or about June 2, 2005, **YOUNG JOO LEE** spoke with KSF 5 who requested a  
6 pick up at "Eighth."

7           68. On or about February 22, 2005, **MIN YOUNG BANG** picked up an Asian female at  
8 1600 Post Street and delivered her to Suk Hee Oriental Massage and Sauna, a brothel in San  
9 Francisco, California.

10          69. On or about April 3, 2005, **MIN YOUNG BANG** spoke with a Korean-speaking  
11 female who requested a ride from Palm Tree Massage, a brothel in San Francisco, and thereafter  
12 agreed to dispatch a car and driver to Palm Tree Massage.

13          70. On or about April 24, 2005, **YOUNG JOON YANG** spoke with a Korean-speaking  
14 female spoke who requested a taxi at Lucky Spa, a brothel in San Francisco.

15          71. On or about April 24, 2005, **YOUNG JOON YANG** called **IN SEUNG KIM**, an  
16 employee of Yang's Taxi, and dispatched him to pick up a Korean-speaking female at Lucky  
17 Spa, a brothel in San Francisco.

18          72. On or about March 3, 2005, **YOUNG JOON YANG** spoke with a Korean-speaking  
19 female who requested a taxi at Empire Health Club, a brothel in San Francisco.

20          73. On or about March 3, 2005, **YOUNG JOON YANG** called the Korean-speaking  
21 female and advised her that he had dispatched a car and driver to Empire Health Club, a brothel  
22 in San Francisco.

23          74. On or about March 3, 2005, **SEYUN KIM**, an employee of Yang's Taxi, picked up  
24 two Korean females from Empire Health Club, a brothel in San Francisco.

25          75. On or about April 19, 2005, **EUGENE YI**, an employee of Yang's Taxi, transported  
26 an Asian female to Geneva Oriental Spa, a brothel in San Francisco.

27          76. On or about April 19, 2005, **YOUNG JOON YANG** spoke with a Korean-speaking  
28 female spoke who requested transportation from Suk Hee Oriental Massage and Sauna, a brothel

1 in San Francisco.

2 77. On or about April 19, 2005, **YOUNG JOON YANG** called **CHANG SOO YOUN**,  
3 an employee of Yang's Taxi, and dispatched him to Suk Hee Oriental Massage and Sauna, a  
4 brothel in San Francisco.

5 78. On or about April 19, 2005, **CHANG SOO YOUN** responded to Suk Hee Oriental  
6 Massage and Sauna to pick up an unidentified Korean-speaking female.

7 79. On or about April 19, 2005, **YOUNG JOON YANG** spoke with a Korean-speaking  
8 female who requested transportation from Lee's Oriental Massage, a brothel in San Francisco.

9 80. On or about April 19, 2005, **YOUNG JOON YANG** called **CHANG SOO YOUN**,  
10 an employee of Yang's Taxi, and dispatched him to Lee's Oriental Massage, a brothel in San  
11 Francisco.

12 81. On or about April 19, 2005, **CHANG SOO YOUN** called **YOUNG JOON YANG**  
13 and confirmed that he responded to Lee's Oriental Massage, a brothel in San Francisco, and  
14 picked up the Korean-speaking female.

15 All in violation of Title 18 United States Code Section 2421.

16 COUNT SIX : (18 U.S.C. § 371 – Conspiracy to Use Facility in Aid of Unlawful Activity)

17 OBJECT OF THE CONSPIRACY

18 82. Between no later than on or about February 22, 2005, and continuing to on or about  
19 June 23, 2005, in San Francisco County, within the Northern District of California, and  
20 elsewhere, defendants

21 **YOUNG JOON YANG,**  
22 **aka Yang,**  
23 **YOUNG JOO LEE,**  
24 **MIN YOUNG BANG,**  
25 **IN SEUNG KIM,**  
26 **SEYUN KIM,**  
27 **EUGENE YI,**  
28 **CHANG SOO YOUN,**  
**MO SOOK YANG,**  
**KEUN SUNG LEE,**  
**aka Kenneth,**  
**MYUNG JIN CHANG,**  
**WON SEOK YOO,**  
**JIMMY GONG YAN LEE,**

1                   **AESUN KIM,**  
2                               aka Mami,  
3                   **HYEON J. PARK,**  
4                   **ANTHONY GAR LAU,**  
5                   **MI YOUNG SIM,**  
6                               aka Jackie,  
7                   **KUM PAE YI,**  
8                   **HAN LEE,**  
9                   **HYE CHA KIM,**  
10                               aka Kelly,  
11                   **JIN AH KANG, and**  
12                   **YON SUK PANG,**  
13                               aka Nana,

14 and others known and unknown to the Grand Jury, conspired to use a facility in interstate  
15 commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion,  
16 management, establishment, and carrying on, of unlawful activity in violation of Title 18, United  
17 States Code Section 1952.

18                   **MANNER AND MEANS OF THE CONSPIRACY**

19           83. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
20 **JOON YANG** owned and operated Yang's Taxi company.

21           84. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
22 **JOON YANG** employed various drivers and assistants, including **MIN YOUNG BANG, IN**  
23 **SEUNG KIM, SEYUN KIM, YOUNG JOO LEE, EUGENE YI, CHANG SOO YOUN,** as  
24 well as others known and unknown to the Grand Jury.

25           85. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
26 **JOON YANG** associated with various business partners, in San Francisco, California, and  
27 elsewhere, including, **MO SOOK YANG, KEUN SUNG LEE, WON SEOK YOO, MYUNG**  
28 **JIN CHANG,** as well as others known and unknown to the Grand Jury.

          86. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
**JOON YANG** provided services for various brothels owners and managers throughout San  
Francisco, California, and elsewhere, including **JIMMY GONG YAN LEE, AESUN KIM,**  
**HYEON J. PARK, ANTHONY GAR LAU, MI YOUNG SIM, KUM PAE YI, YON SUK**  
**PANG, HAN LEE, JIN AH KANG, HYE CHA KIM,** as well as others known and unknown

1 to the Grand Jury.

2 87. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
3 **JOON YANG** utilized two cellular telephones to communicate with his drivers, assistants,  
4 business associates, and numerous brothels owners and managers, and other persons known and  
5 unknown to the Grand Jury, throughout San Francisco, California, and elsewhere.

6 88. Between no later than February 22, 2005, and on or about June 23, 2005, **YOUNG**  
7 **JOON YANG** received telephone calls from, and initiated telephone calls to, his drivers,  
8 assistants, business associates, brothel owners and managers, and others known and unknown to  
9 the Grand Jury, throughout San Francisco, California, and other states, with the intent to  
10 promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or  
11 carrying on of prostitution in brothels in San Francisco, California, and elsewhere.

12  
13 OVERT ACTS

14 89. In furtherance of the conspiracy and to accomplish the object of the conspiracy,  
15 defendants **YOUNG JOON YANG**, aka Yang, **YOUNG JOO LEE**, **MIN YOUNG BANG**, **IN**  
16 **SEUNG KIM**, **SEYUN KIM**, **EUGENE YI**, **CHANG SOO YOUN**, **MO SOOK YANG**,  
17 **KEUN SUNG LEE**, aka Kenneth, **MYUNG JIN CHANG**, **WON SEOK YOO**, **JIMMY**  
18 **GONG YAN LEE**, **AESUN KIM**, aka Mami, **HYEON J. PARK**, **ANTHONY GAR LAU**,  
19 **MI YOUNG SIM**, aka Jackie, **KUM PAE YI**, **HAN LEE**, **HYE CHA KIM**, aka Kelly,  
20 **JIN AH KANG**, and **YON SUK PANG**, aka Nana, and others known and unknown to the  
21 Grand Jury, committed various overt acts within the Northern District of California and  
22 elsewhere, including, but not limited to, the following:

23 90. On or about March 3, 2005, **YOUNG JOO LEE** spoke with KSF 1 who requested  
24 transportation to Lee's Oriental Massage, a brothel in San Francisco, California.

25 91. On or about March 30, 2005, **YOUNG JOON YANG** called KSF 2 and asked that  
26 she to come work at Geneva Oriental Spa, a brothel in San Francisco.

27 92. On or about April 3, 2005, **MIN YOUNG BANG** spoke with a Korean-speaking  
28 female who requested a ride from Palm Tree Massage, a brothel in San Francisco, and thereafter

1 agreed to dispatch a car and driver to Palm Tree Massage.

2 93. On or about April 24, 2005, **YOUNG JOON YANG** called **IN SEUNG KIM**, an  
3 employee of Yang's Taxi, and dispatched him to pick up a Korean-speaking female at Lucky  
4 Spa, a brothel in San Francisco.

5 94. On or about April 5, 2005, **SEYUN KIM**, an employee of Yang's Taxi, called  
6 **YOUNG JOON YANG** and discussed transporting a prostitute to a "ten-day house."

7 95. On or about April 2, 2005, **YOUNG JOON YANG** called **EUGENE YI**, an  
8 employee of Yang's Taxi, and discussed the distribution of advertisements for Geneva Oriental  
9 Spa, a brothel in San Francisco.

10 96. On or about April 19, 2005, **YOUNG JOON YANG** called **CHANG SOO YOUN**,  
11 an employee of Yang's Taxi, and dispatched him to Suk Hee Oriental Massage and Sauna, a  
12 brothel in San Francisco.

13 97. On or about May 20, 2005, **YOUNG JOON YANG** called **MO SOOK YANG**, his  
14 spouse and business partner, and discussed a bank deposit of \$96,080, as well as cash payments  
15 made to **AESUN KIM**, an operator of Geneva Oriental Spa, a brothel in San Francisco.

16 98. On or about March 29, 2005, **JIMMY GONG YAN LEE**, an operator of Acucare  
17 Oriental Spa, a brothel in Emeryville, called **YOUNG JOON YANG**, and requested that  
18 **YOUNG JOON YANG** assist in obtaining "pay money buy girls" for Acucare Oriental Spa.

19 99. On or about April 1, 2005, **AESUN KIM**, an operator of Geneva Oriental Spa, a  
20 brothel in San Francisco, called **YOUNG JOON YANG** and discussed the distribution of  
21 advertisements and flyers for the grand opening of the brothel.

22 100. On or about April 1, 2005, **HYEON J. PARK**, an employee of Geneva Oriental  
23 Spa, called **YOUNG JOON YANG** and discussed advertisements and the importation of  
24 prostitutes for Geneva Oriental Spa.

25 101. On or about March 31, 2005, **YOUNG JOON YANG** called **ANTHONY GAR**  
26 **LAU**, the owner and operator of Golden Flower Steam and Sauna Spa, a brothel in San  
27 Francisco, and discussed the purchase of large quantities of materials to be used in sex acts.

28 102. On or about April 7, 2005, **YOUNG JOON YANG** called **MI YOUNG SIM**, an



1 employee of Lee's Oriental Massage, a brothel in San Francisco, and discussed the delivery of  
2 prostitutes to Lee's Oriental Massage.

3 103. On or about April 11, 2005, **KUM PAE YI**, an employee of Lee's Oriental  
4 Massage, a brothel in San Francisco, spoke with **YOUNG JOO LEE**, an employee of Yang's  
5 Taxi, regarding the delivery of prostitutes to Lee's Oriental Massage.

6 104. On or about May 18, 2005, **KEUN SUNG LEE**, a business associate of **YOUNG**  
7 **JOON YANG**, called **YOUNG JOON YANG**, and discussed laundering United States currency  
8 for **YOUNG JOON YANG** and his prostitution-related businesses.

9 105. On or about April 2, 2005, **YOUNG JOON YANG** called **HYE CHA KIM**, an  
10 employee of Palm Tree Massage, a brothel in San Francisco, and discussed obtaining a Korean  
11 prostitute for Palm Tree Massage.

12 106. On or about May 26, 2005, **YON SUK PANG**, an employee of Suk Hee Oriental  
13 Massage and Sauna, a brothel in San Francisco, called **YOUNG JOON YANG**, and discussed  
14 obtaining a prostitute for Suk Hee Oriental Massage and Sauna.

15 107. On or about March 12, 2005, **HAN LEE**, an employee of Lee's Oriental Massage, a  
16 brothel in San Francisco, called Yang's Taxi, spoke with **YOUNG JOON YANG**, and requested  
17 that **YOUNG JOON YANG** obtain prostitutes to work at Lee's Oriental Massage.

18 108. On or about June 9, 2005, **JIN AH KANG**, an employee of Palm Tree Massage, a  
19 brothel in San Francisco, called **YOUNG JOON YANG**, and requested delivery of large  
20 quantities of materials to be used in sex acts to Palm Tree Massage.

21 109. On or about May 19, 2005, **WON SEOK YOO**, a business associate of **YOUNG**  
22 **JOON YANG**, called **YOUNG JOON YANG**, and discussed the manufacturing and wholesale  
23 distribution of large quantities of materials to be used for the purposes of prostitution.


24 110. On or about June 9, 2005, **MYUNG JIN CHANG**, a business associate of  
25 **YOUNG JOON YANG**, called **YOUNG JOON YANG**, and discussed the delivery of large  
26 quantities of materials to be used for the purposes of prostitution.

27 111. On or about April 15, 2005, **YOUNG JOO LEE** spoke with a Korean female and  
28 discussed the purchase of a plane ticket from Las Vegas, Nevada, to Oakland, California.


1 All in violation of Title 18, United States Code Section 371.

2  
3 DATED: 6/23/05

A TRUE BILL

4  
5   
6 FOREPERSON

7 KEVIN V. RYAN  
8 United States Attorney

9   
10 EUMI L. CHOI  
11 Chief, Criminal Division

12 (Approved as to form: )  
13 AUSA PETER B. AXELROD  
14 ANDREW J. KLINE, Trial Attorney  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28